

## **REMARKS**

Claims 1-4 stand rejected under 35 U.S.C. 112 second paragraph as being indefinite. In response, Applicants amended claim 1 to clarify that each holding unit includes a vacuum chuck device and another chuck device, and request withdraw of the rejection on this basis.

Claim 1 stands rejected under 35 U.S.C. 102(e) as being anticipated by Russell (U.S. Patent No. 6,254,716). In response, Applicants amended claim 1 to recite, among other things, that each holding unit includes a vacuum chuck device for holding an associated substrate using a difference in pressure and another chuck device, and respectfully traverse. Applicants respectfully traverse because the cited reference does not disclose (or suggest) a vacuum chuck device for holding a substrate.

Russell discloses a processing apparatus 20 for joining to optical disks 28, 32 into a disk assembly 96. The processing apparatus 20 includes an upper disk support 24 for holding an upper disk 28 and a lower disk support 26 for holding a second or lower disk 32. However, the lower disk support 26 does not have a vacuum chuck device for holding the disk 32 using a difference in pressure, as now recited in amended claim 1. For this reason, withdrawal of the §102 rejection of amended claim 1 is respectfully requested.

Claims 1 and 43 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Russell, and further in view of Omagari (JP 2000-258746). Applicants traverse the rejection for the reasons stated above, namely the combination of the cited references fail to disclose or suggest, among other things, each holding unit including a vacuum chuck device for holding the associated substrate using a difference in pressure and another chuck device,

as now recited in amended claims 1 and 43.

Omagari discloses a substrate laminating device including a lower plate 6 and an upper plate 8. The lower plate 6 does not have a vacuum chuck device for holding a substrate 16 using a difference in pressure. Therefore, even if Omagari were combined with the Russell reference, the cited references would still fail to disclose or suggest the vacuum chuck device.

In contrast, the present invention provides an apparatus for manufacturing a bonded substrate, and includes first and second holding units for holding substrates. Since each holding unit includes a vacuum chuck device for holding an associated substrate using a difference in pressure and another chuck device, both substrates can be held by their associated holding units by the vacuum chuck devices. Therefore, the substrates can be properly bonded to each other, and defects occurring because of the bonding of the substrate can be prevented. Since the cited reference fails to achieve this advantage, and because the combination of the cited references fail to disclose or suggest each holding unit including a vacuum chuck device for holding an associated substrate using a difference in pressure and another chuck device, withdrawal of the §103 rejection of independent claims 1 and 43 is respectfully requested.

Claims 2-4 and 44 stand rejected under 35 U.S.C. 103(a) as being obvious over Russell, Omagari, and Fujikawa (JP 05-326451). In response, Applicants respectfully traverse the rejection for the reasons recited above with respect to the rejection of claims 1 and 43.

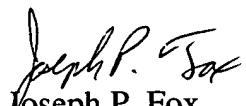
Fujikawa discloses a plasma treatment apparatus including a gas showering element 8 and a substrate holder 2 opposed to each other. The substrate holder 2 has an electrostatic chuck 4 in a vacuum pipe 3. However, Fujikawa does not disclose or suggest an upper holding unit including a vacuum chuck device and another chuck device, as now recited in amended claims 1 and 43. That is, the combination of Fujikawa, Omagari, and Russell fail to disclose or suggest an upper holding unit including a vacuum chuck device and another chuck device, and fails to prevent defects during bonding, as in the present invention. For these reasons, Applicants request withdrawal of the §103 rejection of claims 2-4 and 44, which depend from claims 1 and 43, respectfully.

New claims 58-59 are added. Claims 58 and 59 recite, among other things, first and second holding units that each include a vacuum chuck device for holding an associated substrate using a difference in pressure and another chuck device. For the reasons recited above, Applicants earnestly solicit allowance of new claims 58-59.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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April 19, 2004

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